

EXHIBIT A

FILED
COURT OF COMMON PLEAS
TUSCARAWAS COUNTY IN THE COURT OF COMMON PLEAS

2010 NOV 30 P 4: 29 TUSCARAWAS COUNTY, OHIO

ROCKNE W. CLARKE
CLERK OF COURTS

GENERAL TRIAL DIVISION

2010 CV 11 1327
* Case No.:

ROBERT MEESE,
122 St. Clair Avenue SE
New Philadelphia, OH 44663

* JUDGE
* ELIZABETH L. THOMAKOS, JUDGE

Plaintiff,

Vs.

✓ TRAVELERS INSURANCE COMPANY
OF AMERICA,
1 Tower Square
Hartford, CT 06183

* COMPLAINT

*

*

Defendant.

COUNT I

1. At all times relevant hereto Plaintiff owned and occupied real estate located at 122 St. Clair Avenue SE, New Philadelphia, Ohio.
2. Plaintiff contacted Defendant through an agency located in New Philadelphia, Ohio and purchased a policy of insurance to cover his business equipment.
3. Plaintiff while vacationing in the State of Delaware received notice that his home had been broken into December 1, 2008 and a police report had been filed with the New Philadelphia Police Department.
4. As a result of the break-in to his residence, Robert R. Meese filed a claim and proof of loss with Travelers Insurance Company through the New Philadelphia, Ohio Agency where he purchased the policy.

5. Plaintiff filled out all documentation and underwent close scrutiny by Defendant to establish his claim.
6. Defendant has refused to pay and allow this loss.
7. Defendant has acted in bad faith requiring Plaintiff to provide documents not relevant to this loss and to require Plaintiff to hire an attorney to process the claim as Defendant created improper standards and requirements to block and deny this claim.

COUNT II

8. Plaintiff incorporates the above numbered paragraphs herein as if more fully rewritten restated herein.
9. Defendant through its agents, employees and others while investigating this claim intimated to the local police department, a company where Plaintiff purchased business tools and equipment and others that Plaintiff was making a false claim.
10. Defendant through its agents, employees and others has committed defamation of Plaintiff's name and character holding Plaintiff up to public disdain.

WHEREFORE, Plaintiff claims damages in the amount of Eighty Thousand Three Hundred Fifty Seven Dollars and fifty-two cents (\$80,357.52) and One Hundred Thousand Dollars (\$100,000.00) for the damage to character and reputation caused by defamation plus attorney fees and court costs expended herein.

Respectfully Submitted,
Johnson, Urban & Range Co., LPA
117 South Broadway, P.O. Box 1007
New Philadelphia, Ohio 44663
330-364-5593

By: 

Michael C. Johnson
Atty. Reg. No: 0011845
Attorney for Plaintiff

In The Court of Common Pleas
Tuscarawas County, Ohio
General Trial Division

RECEIVED
DEC 07 2010
HARTFORD

Robert Meese : Case No. 2010 CV 11 1327
Plaintiff :
 : Judge Elizabeth Lehigh
 : Thomakos

vs. :

Travelers Insurance Company of : Summons on Complaint
America :

Defendant :

CORPORATE LITIGATION
HARTFORD

TO: Travelers Insurance Company of America
1 Tower Square
Hartford, CT 06183

DEC 07 2010

RECEIVED PM

You have been named a Defendant or a Respondent in a Complaint (attached) filed against you by the Plaintiff(s) listed above.

Requirements: You are summoned and required to do the following:

1. You must deliver or mail (serve) a copy of your **Answer** upon Plaintiff's attorney **within 28 days after receipt of this summons.**

If Plaintiff does not have an attorney, you must deliver or mail a copy directly to the Plaintiff(s).

The 28 day deadline does not include the date you received this summons but does include the day on which the 28th day occurs.

Civil Rule 6 provides in part that "the day of the act, event, or default from which the designated period of time begins to run shall not be included. The last day of the period so computed shall be included, unless it is a Saturday, a Sunday, or a legal holiday, in which event the period runs until the end of the next day which is not a Saturday, a Sunday, or a legal holiday."

2. You must file your original **Answer** with the Clerk of Court's Office **within 3 days** after you serve the Plaintiff's attorney or Plaintiff(s).

**** If you fail to do both Step 1 and Step 2, a judgment by default may be issued against you granting Plaintiff(s) the relief demanded in the Complaint.**

Mediation: Our court regularly provides free mediation in most civil case types. If you complete both step 1 and step 2, your case may be considered for the Court's free mediation service.

Southeastern Ohio Legal Services provides free legal assistance in some case types to people with a low income. Call 330-339-3998 to find out if they can assist you.

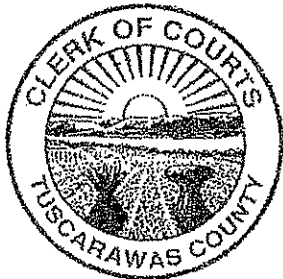
Deliver or mail a copy of your Answer to the attorney below unless the plaintiff is not represented by an attorney: (See Requirement 1 above)

Michael C. Johnson
117 South Broadway
New Philadelphia, OH 44663-3828

File your original Answer with:

Tuscarawas County Clerk of Court
125 E. High Ave., Room 230
PO Box 628
New Philadelphia, Ohio 44663-0628

Issued December 1, 2010

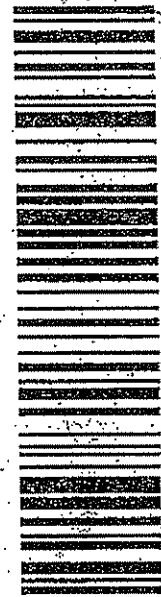


BY

Rockne W. Clarke
Tuscarawas County Clerk of
Common Pleas Court

Lisa Pastircak
Deputy Clerk of Courts

IF UNDELIVERABLE RETURN TO
ROCKNE W. CLARKE
CLERK OF COURTS - TUSCARAWAS COUNTY
125 E. High Avenue
P.O. Box 628
New Philadelphia, Ohio 44663-0628



7192 3789 0010 1019 7582

FED MAIL



UNITED STATES POSTAGE
\$05.71⁰
02 1A
0004334013 DEC 02 2010
MAILED FROM ZIP CODE 44663

RETURN RECEIPT REQUESTED

SHOWING TO WHOM, DATE AND ADDRESS WHERE DELIVERED

2010 CV 11 1327

Travelers Insurance Company of America
1 Tower Square
Hartford, CT 06183